

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

Motion to Compel
(September 6, 2011)

On July 27, 2011, the Postal Service formally requested an Advisory Opinion from the Postal Regulatory Commission regarding an initiative to close over 3600 Post Offices.¹ As detailed in the August 30th motion filed by the APWU², the Postal Service has yet to provide important information responsive to interrogatory requests. The Postal Service has filed Library References containing the following: geographic location data for some (but not all) postal retail locations,³ operating cost and revenue data for some (but not all) postal retail locations,⁴ and numerous PDFs containing details for thousands of postal retail location that cannot be analyzed due to their formats⁵. In USPS-N2011-1-LR-NP4, the Postal Service provided PO Box information for over 1000 postal retail locations for which no location, cost, or revenue information has been provided.

Pursuant to Rule 26(d) of the Commission Rules of Practice, the Public Representative moves to compel the Postal Service to respond to two Public Representative interrogatories.

Due to the lack of clarity regarding the number and location of postal retail facilities, on August 4, 2011, the Public Representative requested the database used at <http://usps.whitepages.com> to provide consumers of the proximity of postal retail locations. On August 11, 2011, the Postal Service stated that the “the database is the intellectual property of Microsoft and is not within the custody or control of the Postal

¹ Request of The United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services (July 27, 2011)

² American Postal Workers Union, AFL-CIO Motion Requesting United States Postal Service To Provide A Detailed Statement On Outstanding Discovery (August 30, 2011)

³ USPS-LRN2011-1-NP1 file “FDB CMN Core.xls” which lists 30531 postal retail locations, but does not include unique finance numbers for 526 locations, unique addresses for 8 locations, or unique zip codes for 4 locations.

⁴ USPS-LRN2011-1-NP3 file “Lib Ref forPR1e.xls” which contains cost and revenue information for 30461 postal retail locations, but only contains information for 1 location in the Arkansas district.

⁵ See USPS-LRN2011-1-6 and USPS-LRN2011-1-7

Service.”⁶ Due to the importance of gaining access to this database, the Public Representative has worked diligently to reach an agreement to license the software used to map postal retail facilities. Even when informed that the proprietary software should no longer be an issue, the Postal Service remained unwilling to provide the requested information.

While the Postal Service’s original response implies that it does not control the database that contains information regarding the location of postal retail locations, its recent unwillingness to provide the postal retail facility database underscores that the Postal Service has simply chosen not to provide the database.

The Postal Service argues that it’s retail footprint is oversized, but without accurate and complete geographic information judgment of this claim cannot be made. Furthermore, without an understanding of the size and scope of the postal retail footprint, the impact and desirability of the RAOI process cannot be understood.

On September 2, 2011, the Postal Service provided an incomplete response to Public Representative interrogatory 16 in USPS-LRN2011-1NP6.⁷ The interrogatory requested information for each postal retail facility regarding the following details, which the Postal Service did not respond to:

- a. b_mail_acceptance_station_num
- b. atm_ind
- c. bldg_historic_code
- d. bldg_area_int_tot_sqft
- e. coll_average_bulk_mail
- f. dmu_stffng_bmeu_fac_id
- g. nass_resp_scf_code
- h. rtl_retail_window_cnt
- i. rtl_window_clerk_cnt
- j. rtl_irt_cnt:
- k. rtl_working_retail_window_cnt
- l. ANNUAL_RENT_AMT
- m. BUILDING_LEASE_FMV_AMT
- n. LEASE_EXPIRATION_DATE
- o. TERM_YRS_CNT
- p. FAC_ZIP_CARRIERS_T_CARRIER_ROUTE
- q. FDB_EACSS_V_ No of Employees

⁶ Responses Of The United States Postal Service To Public Representative Interrogatories PR/USPS-T1-6 Through 9 Redirected From Witness Boldt (August 11,2011)

⁷ Responses Of The United States Postal Service To Public Representative Institutional Interrogatories PR/USPS-13 Through 16 (September 2, 2011)

- r. NASS_CODE
- s. NASS_TYPE

The Postal Service did not object to these subparts, but did not provide any information regarding these topics. The information requested involves vital topics such as lease cost, lease length, retail windows in operations, and the number of employees at each facility. Without this information, it will be impossible to gauge the intent, method, and impact of the Postal Service's N2011-1 proposal.

For the forgoing reasons, the Commission should compel the Postal Service to provide a response to PR/USPS-T-1-9 and PR/USPS-16. As demonstrated, the information requested in these interrogatories is highly relevant to the current proceedings.

Respectfully Submitted,

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